Southern Nuclear

Jamie M. Coleman
Regulatory Affairs Director
Vogtle 3 & 4

7825 River Road
Waynesboro, GA 30830
706-848-6926 tel

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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC C.2.6.09.08a [Index Number 668]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.2.6.09.08a [Index Number 668]. This ITAAC confirms that penetrations and openings through the protected area barrier are secured and monitored. This ITAAC also confirms that unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (NEI) 08-01, “Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52,” which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

Jamie Coleman

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Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC C.2.6.09.08a [Index Number 668]

JMC/SRV/sfr

cc: Regional Administrator, Region ll
Director, Office of Nuclear Reactor Regulation (NRR)
Director, Vogtle Project Office NRR
Senior Resident Inspector – Vogtle 3 & 4

Southern Nuclear Operating Company
ND-23-0122
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC C.2.6.09.08a [Index Number 668]

ITAAC Statement

Design Commitment

8.a) Penetrations through the protected area barrier are secured and monitored.

8.b) Unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary will be protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.

Inspections/Tests/Analyses

Inspections will be performed of penetrations through the protected area barrier.

Inspections will be performed of unattended openings that intersect the protected area boundary or vital area boundary.

Acceptance Criteria

Penetrations and openings through the protected area barrier are secured and monitored.

Unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.

ITAAC Determination Basis

Inspections of the penetrations through the protected area barrier and of the unattended openings that intersect the protected area boundary or vital area boundary were performed to verify that penetrations and openings through the protected area barrier are secured and monitored, and the unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation. The VEGP Unit 4 Plant Security System ITAACs only cover the Unit 4 plant security system design commitment scope.

Penetrations and openings through the protected area barrier are secured and monitored.

A walkdown inspection was performed of the as-built protected area barrier as described in ITAAC Technical Report SV4-SES-ITR-800646 (Reference 1) to verify that the penetrations and openings through the protected area barrier are secured and monitored and satisfy the applicable protected area barrier penetration and opening requirements of the VEGP Units 1-4 Physical Security Plan associated with 10 CFR 73.55(e)(8)(ii).

The inspection involved visual observation of each protected area barrier penetration and opening, that could provide unauthorized access through the protected area barrier, to confirm that the penetration or opening is secured, and monitored by intrusion detection equipment that will alert security force personnel of unauthorized access through the protected area barrier penetration or opening.

The results of the inspection are documented in Reference 1 and verify that the penetrations and openings through the protected area barrier are secured and monitored.

Unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.

Inspections were performed to verify that unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation and satisfy the applicable protected area boundary and vital area boundary unattended openings requirements of the VEGP Units 1-4 Physical Security Plan associated with 10 CFR 73.55(i)(5)(iii).

The unattended opening protected area boundary inspection was performed as documented in ITAAC Technical Report SV4-SES-ITR-800668 (Reference 2) and involved a review of approved construction drawings and performance of walkdowns to identify unattended openings with an entry point exterior to the protected area boundary and an exit point interior to the protected area boundary that could potentially meet or exceed the 96 square inch (with at least one dimension equal to or greater than 6 inches) criteria used to identify unattended openings that are potentially traversable pathways which could be used as exploitable entry points into the protected area. As discussed in NRC endorsed Nuclear Energy Institute (NEI) 09-05 (Reference 3), pathways with documentation that shows the pathway cannot be physically traversed by persons and/or equipment due to pathway configuration or un-survivable conditions is not considered a potentially traversable pathway. Each identified potentially traversable pathway was verified to be protected by an acceptable physical barrier, and either monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation. Types of surveillance include area observation by fixed posts, closed circuit television (CCTV) by fixed posts or alarm station personnel, dedicated observer using CCTV/monitoring equipment, routine surveillance or physical inspection by roving patrols or posts, or a combination thereof.

The VEGP Unit 4 physical security design includes several vital areas that are located within a larger vital area. In cases where a specific vital area boundary is located within a larger vital area boundary, the unattended opening vital area boundary inspection and acceptance criteria are applied only to the first vital area boundary that would be encountered by an adversary. This is consistent with the requirements of 10 CFR 73.55(e)(9)(i), which require that vital equipment be located only within vital areas, which must be located within a protected area so that access to vital equipment requires passage through at least two physical barriers. For stand-alone vital areas, not located within another vital area, the inspection and acceptance criteria are applied to the stand-alone vital area boundary.

The unattended opening vital area boundary inspection was performed as documented in Reference 2 and involves a review of approved construction drawings and performance of walkdowns to identify unattended openings with an entry point exterior to the vital area boundary and an exit point interior to the vital area boundary that could potentially meet or exceed the 96 square inch (with at least one dimension equal to or greater than 6 inches) criteria used to identify unattended openings that are potentially traversable pathways which could be used as an exploitable entry point into the vital area under review. As discussed in Reference 3, pathways with documentation that shows the pathway cannot be physically traversed by persons and/or equipment due to pathway configuration or un-survivable conditions are not considered a potentially traversable pathway. Each identified potentially traversable pathway was verified to be protected by an acceptable physical barrier, and either

monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation. Types of surveillance include area observation by fixed posts, closed circuit television (CCTV) by fixed posts or alarm station personnel, dedicated observer using CCTV/monitoring equipment, routine surveillance or physical inspection by roving patrols or posts, or a combination thereof.

The results of the unattended opening inspections are documented in Reference 2 and verify that unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.

References 1 and 2 are available for NRC inspection as part of the Unit 4 ITAAC C.2.6.09.08a Completion Package (Reference 4).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there were no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC C.2.6.09.08a (Reference 4) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC C.2.6.09.08a was performed for VEGP Unit 4 and that the prescribed acceptance criteria was met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV4-SES-ITR-800646, SES Alarm Stations Single Act Survivability: ITAAC 2.6.09.05c, Rev 0 (Security Related Information)
2. SV4-SES-ITR-800668, Inspection of Unattended Openings Intersecting the Protected Area or Vital Area Boundaries, Rev 0 (Security Related Information)
3. NEI 09-05, Guidance on the Protection of Unattended Openings that Intersect a Security Boundary, Rev. 0 (Security Related Information)
4. C.2.6.09.08a-U4-CP-Rev0, ITAAC Completion Package